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McCABE, WEISBERG & CONWAY, P.C.

By: James French, Esq., (Atty. I.D.# JF9442)

216 Haddon Avenue, Suite 201

Westmont, NJ 08108

(856) 858-7080

Attorneys for Movant: Lakeview Loan Servicing, LLC.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Camden Vicinage

IN RE: Nelson I Antonio aka Pedro I Antonio
aka Pedro I Antonio De Los Santos aka Pedro
Antonio De Los Santos

Debtor

Case No.: 19-10706-ABA

Chapter: 13

Judge: Andrew B. Altenburg Jr.

NOTICE OF MOTION FOR RELIEF FROM
THE AUTOMATIC STAY

TO:

Nelson I Antonio aka Pedro I Antonio aka
Pedro I Antonio De Los Santos aka Pedro
Antonio De Los Santos
14 Kay Lane
Sicklerville, New Jersey 08081

Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Ste 502
Philadelphia, Pennsylvania 19107

Isabel C. Balboa, Trustee
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, New Jersey 08002

DEAR SIRS AND MADAMS:

PLEASE TAKE NOTICE that on November 26, 2019 at 10:00 a.m., or as soon as counsel may be heard, the undersigned attorney for the secured creditor, **Lakeview Loan Servicing, LLC.**, will move before the United States Bankruptcy Court, District of New Jersey, for an Order Vacating the Automatic Stay with respect to property known as 14 Key Lane, Sicklerville, New Jersey 08081, to commence or continue its foreclosure action, by reason of the

failure of the Debtor to make regular monthly mortgage payments outside his/her Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE that if you wish to contest this motion, you must file a written response with the Clerk of the Bankruptcy Court and serve a copy of the responding papers upon the undersigned at least seven (7) days before the date of the hearing.

PLEASE TAKE FURTHER NOTICE that the moving party avers that no brief is necessary as the matter does not involve complex legal issues.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby waives oral argument and relies upon the Certifications in support of this motion unless the matter is contested.

Date: November 5, 2019

McCABE, WEISBERG & CONWAY, LLC

/s/ James French
James French, Esquire